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Remarks

The Office Action dated October 27, 2003 has been carefully reviewed and the foregoing amendment has been made in consequence thereof.

Claims 1, 4-13, 16-24, and 27-41 are pending in this application. Claims 1, 4-8, 11-13, 16-18, 21, 23, 24, 27, 28, 31, and 33 stand rejected. Claims 9, 10, 19, 20, 22, 29, 30, 32, and 34-41 are withdrawn from consideration.

The rejection of Claims 1, 4-8, 11-13, 16-18, 21, 23, 24, 27, 28, 31, and 33 under 35 U.S.C. § 102(b) as being anticipated by Meuschke et al. (US 4,200,172) is respectfully traversed.

Applicants respectfully submit that the Section 102 rejection of the presently pending claims is not a proper rejection. The Federal Circuit has opined that to anticipate a claim, a single source must contain all of the elements of the claim. See *Hybritech Inc. v. Monoclonal Antibodies, Inc.*, 802 F.2d 137, 1379, 231 U.S.P.Q. 81, 90 (Fed. Cir. 1986). Also, missing elements may not be supplied by the knowledge of one skilled in the art or the disclosure of another reference. See *Structural Rubber Prods. Co. v. Park Rubber Co.*, 749 F.2d 707, 716, 223 U.S.P.Q. 1264, 1271 (Fed. Cir. 1984).

Claim 1 of the present application recites a reactor servicing platform that includes "a frame comprising a plurality of interconnected beams; a support structure attached to said frame; a floor attached to a top of said frame, said floor comprising a reactor access opening sized to permit access to the reactor pressure vessel; and at least one auxiliary platform movably coupled to said frame and extending into said access opening, said at least one auxiliary platform movable along a perimeter of said access opening of said floor".

Meuschke et al. do not describe nor suggest a reactor servicing platform as recited in Claim 1. Rather, Meuschke et al. describe a work station apparatus that includes an enclosure assembly having two enclosures joined to an overhead horizontal support frame assembly which is suspended from a crane assembly. The crane assembly is supported on a rectangular frame of horizontal beams welded together and supported at the corners by vertical columns that are secured to and extending upwardly from a support ring. The support ring sits on a plurality of mounting brackets that are attached to the upper rim edge of a steam generator shell. The enclosure assembly includes a plurality of wheels arranged for circumferential rolling engagement with the inner surface of the steam generator shell which provides movement about the center axis of the steam generator.

Particularly, Meuschke et al. do not describe nor suggest a reactor servicing platform having a frame comprising a plurality of interconnecting beams, and a floor attached to the top of the frame. Meuschke et al. describe a horizontal support frame assembly 65, but does not describe nor suggest a floor attached to the top of frame 65. The Office Action, at page 3, suggests that the mounting bracket assemblies 86 comprise a frame because they are interconnected by the support ring 85 which the Office Action suggests is also the floor of the platform. Applicants disagree with this suggestion because Claim 1 specifically recites "a frame comprising a plurality of interconnected beams". Claim 1 does not recite a plurality of brackets interconnected by a "floor" (support ring). Further, the support ring is not attached to the mounting brackets. The support ring just rests on top of the mounting brackets. Meuschke et al. describe at Col. 6, lines 17-20 that "the entire assembly will then be raised upwardly from the mounting pads 86 disposed on the upper rim 34 of the upper shell 7". Applicants submit that the

entire assembly could not be raised off of the mounting pads if the support ring was attached to the mounting pads.

Also, Meuschke et al. do not describe nor suggest a reactor servicing platform that includes at least one auxiliary platform movably coupled to the frame and extending into the access opening and movable along a perimeter of the access opening of the floor. Rather, Meuschke et al. describe that the enclosure assembly having two enclosures joined to an overhead horizontal support frame assembly is suspended from a crane assembly. The Office Action, at page 3, suggests that enclosure assembly is an auxiliary platform and that the enclosure assembly is movable along the perimeter of the floor opening. Applicants agree that the enclosure assembly is rotatable around the center axis of the steam generator shell, but Meuschke et al. do not describe nor suggest that the enclosure assembly is movably coupled to the frame (mounting brackets 86 as defined by the Office Action) nor that the enclosure assembly moves along the perimeter of the access opening. Rather, Meuschke et al. describe that the enclosure assembly engages the inner surface of the steam generator shell through the plurality of wheel assemblies extending from the enclosure assembly.

For the reasons set forth above, Applicants respectfully submit that Meuschke et al. do not describe nor suggest a reactor servicing platform as recited in Claim 1. Accordingly, Claim 1 is submitted to be patentable over Meuschke et al.

Claims 4, 7, 8 and 11-12 depend from independent Claim 1. When the recitations of dependent Claims 4, 7, 8 and 11-12 are considered in combination with the recitations of Claim 1, Applicants respectfully submit that Claims 4, 7, 8 and 11-12 likewise are patentable over Meuschke et al.

Claim 13 recites a nuclear reactor that includes a primary containment vessel, a reactor pressure vessel positioned in the primary containment vessel, and a reactor servicing platform. The reactor servicing platform includes "a frame comprising a plurality of interconnected beams; a support structure attached to said frame; a floor attached to a top of said frame, said floor comprising a reactor access opening sized to permit access to the reactor pressure vessel; and at least one auxiliary platform movably coupled to said frame and extending into said access opening, said at least one auxiliary platform movable along a perimeter of said access opening of said floor".

Meuschke et al. do not describe nor suggest a nuclear reactor as recited in Claim 13. Particularly, and for the reasons explained above, Meuschke et al. do not describe nor suggest a reactor servicing platform having a frame comprising a plurality of interconnecting beams, and a floor attached to the top of the frame. Also, as explained above, Meuschke et al. do not describe nor suggest a reactor servicing platform that includes at least one auxiliary platform movably coupled to the frame and extending into the access opening and movable along a perimeter of the access opening of the floor. Further, Meuschke et al. do not describe nor suggest a reactor pressure vessel. Rather Meuschke et al. describe a steam generator in a nuclear plant. The Office Action suggests, at page 3, that "reactor pressure vessel", recited in Claim 13, reads on the steam generator described by Meuschke et al. Applicants disagree with this suggestion because in the nuclear field of art, the term "reactor pressure vessel" refers to the pressure vessel that houses the nuclear core and not a steam generator. Accordingly, Applicants submit that Claim 13 is patentable over Meuschke et al.

Claims 16-18, 21, and 23 depend from independent Claim 13. When the recitations of dependent Claims 16-18, 21, and 23 are considered in combination with the recitations of Claim 13, Applicants respectfully submit that Claims 16-18, 21, and 23 likewise are patentable over Meuschke et al.

Claim 24 of the present application recites a method of servicing a nuclear reactor during a reactor outage. The method includes positioning a servicing platform above the reactor pressure vessel and performing predetermined servicing operations. The servicing platform includes "a frame comprising a plurality of interconnected beams, a support structure attached to the frame, a floor attached to a top of the frame, the floor comprising a reactor access opening sized to permit access to the reactor pressure vessel, and at least one auxiliary platform movably coupled to the frame and extending into the access opening, the at least one auxiliary platform movable along a perimeter of the access opening of the floor".

Meuschke et al. do not describe nor suggest a method of servicing a nuclear reactor as recited in Claim 24. Particularly, and for the reasons explained above, Meuschke et al. do not describe nor suggest a reactor servicing platform having a frame comprising a plurality of interconnecting beams, and a floor attached to the top of the frame. Also, as explained above, Meuschke et al. do not describe nor suggest a reactor servicing platform that includes at least one auxiliary platform movably coupled to the frame and extending into the access opening and movable along a perimeter of the access opening of the floor. Further, as explained above, Meuschke et al. do not describe nor suggest a reactor pressure vessel. Accordingly, Applicants submit that Claim 24 is patentable over Meuschke et al.

Claims 27, 28, 31 and 33 depend from independent Claim 24. When the recitations of dependent Claims 27, 28, 31 and 33 are considered in combination with the recitations of Claim 24, Applicants respectfully submit that Claims 27, 28, 31 and 33 likewise are patentable over Meuschke et al.

For the reasons set forth above, Applicants respectfully request that the Section 102(b) rejection of Claims 1, 4-8, 11-13, 16-18, 21, 23, 24, 27, 28, 31, and 33 be withdrawn.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Favorable action is respectfully solicited.

Respectfully submitted,



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